

Before the  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

AUG 24 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Amendment of Section 73.202(b)  
Table of Allotments  
FM Broadcast Stations  
(Copeland, Kansas)

)  
)  
) MM Docket No. 95-85  
) RM-8518  
)  
)

To: Chief, Allocations Branch  
Policy and Rules Division

DOCKET FILE COPY ORIGINAL

Reply Comments

Great Plains Christian Radio, Inc., by its attorney and pursuant to Section 1.415 of the Commission's Rules and Regulations, hereby respectfully submits its Reply Comments with respect to the Notice of Proposed Rule Making released by the Federal Communications Commission on June 19, 1995 (see FCC Release DA-1258) in the above-referenced matter.

The only Comments served on the above-referenced Petitioner, Great Plains Christian Radio, Inc., before (or after) the August 10, 1995 comment/counterproposal deadline established in the Commission's Notice of Proposed Rulemaking, supra, were those of Dana J. Puopolo (hereinafter "Puopolo").

In Paragraph 1 of Puopolo's August 9, 1995 "Comments and Counterproposal", Puopolo proposed assigning FM Channel 280C1 (i.e., the original channel proposed by the Petitioner for Copeland, Kansas) to Ingalls, Kansas in lieu of Copeland, Kansas and the assignment of Channel 224C1\* to Copeland, Kansas in its stead.

No. of Copies rec'd  
LIST A B C D E

044

Attached hereto is an FM spacing study which demonstrates that the assignment of Channel 224C1 to Copeland, Kansas is not feasible in light of a significant short-spacing to KKBS (FM), Guymon, Oklahoma.

Upon receipt of Mr. Puopolo's August 9, 1995 filing, undersigned Counsel contacted Mr. Puopolo and alerted him to the problem and suggested an alternative channel which would be available for allotment to Ingalls, Kansas. That channel is 242C1. Puopolo indicated to undersigned Counsel orally (as well as in Paragraph 3 of his August 9, 1995 Comments and Counterproposal) that he would accept the allotment of an equivalent channel to Ingalls, Kansas.

As such, as of the date of this filing, it is believed by undersigned Counsel that Mr. Puopolo intends to request the allotment of Channel 242C1 to Ingalls, Kansas and support the allotment of Channel 280C1\* to Copeland, Kansas.

Great Plains Christian Radio, Inc. hereby reiterates its support for the allotment of Channel 280C1\* to Copeland, Kansas and its intention to apply for said channel should the FCC allot same. With the availability of Channel 242C1 at Ingalls, Kansas, both Great Plains' proposed allotment (i.e., 280C1\* at Copeland, Kansas) and that of Mr. Puopolo (i.e., 242C1 at Ingalls, Kansas) can be accommodated.

Wherefore, based on the foregoing, Great Plains Christian Radio, Inc. respectfully reiterates its support for the proposed amendment of the FM Table of Allotments, Section 73.202(b) of the Commission's Rules, to include Channel 280C1\*. It is Great Plains Christian Radio, Inc.'s intention to apply for Channel 280C1\* if it is allotted by the FCC and, if authorized, to build the station promptly.

Respectfully submitted,

Great Plains Christian Radio, Inc.

By: Stephen C. Simpson  
Stephen C. Simpson  
Its Attorney

1090 Vermont Avenue, N.W.  
Suite 800  
Washington, D.C. 20005  
(202) 408-7035

Attachment

08-16-1995

Larry Waggoner

PAGE 1

FM Study for: ALLOC  
Location: COPELAND, KS  
Call City, State  
Status Proponent

FCC Database Date: 7/95  
Channel Class: C1  
Chan Class Freq kW Latitude Dist. Required  
File Number HAAT Longitude Azm. Clear (km)

>>>>>> Study For Channel 224 92.7 MHz <<<<<<<

|       |   |               |      |           |             |       |       |       |
|-------|---|---------------|------|-----------|-------------|-------|-------|-------|
| KKBS  | GUYMON, OK                                | 224 C3        | 92.7 | 11.5      | 36-40-13    | 122.8 | 211   |       |
| LIC   | PANHANDLE COMMUNICATI                     | BLH-921208KD  | 148  | 101-28-48 | 218.3       | -88.2 | SHORT |       |
|       | Use of 73.215 for short spacing requires: | 200           |      |           |             | -77.2 | SHORT |       |
| ALLOC | SHAMROCK, TX                              | 224 A         | 92.7 |           | 35-12-51    | 260.8 | 200   |       |
| VAC   |   | -             |      |           | 0 100-13-47 | 172.0 | +60.8 | CLEAR |
|       | First Come/First Served Allotment         |               |      |           |             |       |       |       |
| KANR  | BELLE PLAINE, KS                          | 224 C3        | 92.7 | 12.0      | 37-20-08    | 281.0 | 211   |       |
| CP    | DANIEL D. SMITH                           | BMPH-930528IC | 143  | 97-27-53  | 93.7        | +70.0 | CLEAR |       |
| KQMA  | PHILLIPSBURG, KS                          | 223 C1        | 92.5 | 100.      | 39-37-02    | 257.9 | 177   |       |
| LIC   | BARRACUDA BROADCASTIN                     | BLH-840726CY  | 156  | 99-17-55  | 26.3        | +80.9 | CLEAR |       |
| KILS  | MINNEAPOLIS, KS                           | 224 C2        | 92.7 | 50.0      | 39-00-52    | 309.3 | 224   |       |
| LIC   | LESSO, INC.                               | BLH-930303KF  | 142  | 97-37-42  | 57.2        | +85.3 | CLEAR |       |

Certificate of Service

I hereby certify that a copy of the foregoing document was this 24th day of August, 1995 forwarded by First Class mail, postage pre-paid, to the following:

John A. Karousos \*  
Chief, Allocations Branch  
Policy and Rules Division  
Mass Media Bureau  
Federal Communications Commission  
2025 M Street, N.W. Room 8322  
Washington, D.C. 20036

Dana J. Puopolo  
37 Martin Street  
Rehoboth, MA 02769

Stephen C. Simpson

\* By Hand Delivery to FCC's Mail Room.